



**Public Comments**  
**Rebecca Thomas to: Jack Whyte**

01/13/2010 04:43 PM

Jack - Please make two copies of the summary and complete commentary - one for me and one for the Records Center. Thanks!

U.S. EPA, Region 8  
Rebecca Thomas (EPR-SR)  
1595 Wynkoop  
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— Forwarded by Rebecca Thomas/EPR/R8/USEPA/US on 01/13/2010 04:41 PM —

From: "Rodriguez-Newstrom, Linda" <Rodriguez-NewstromL@cdm.com>  
To: Victor Ketellapper/R8/USEPA/US@EPA, Ted Linnert/OCF/R8/USEPA/US@EPA, Rebecca Thomas/EPR/R8/USEPA/US@EPA, Russell Leclerc/R8/USEPA/US@EPA, Mike Cirian/R8/USEPA/US@EPA, David Berry/R8/USEPA/US@EPA, Martin McComb/R8/USEPA/US@EPA, Wendy OBrien/R8/USEPA/US@EPA, Mary Goldade/R8/USEPA/US@EPA, Stanley Christensen/R8/USEPA/US@EPA  
Date: 01/08/2010 01:48 PM  
Subject: fyi—LATAG Newsletter January 2010.pdf

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**From:** Phillip Erquiaga [mailto:phillip@latag.org]  
**Sent:** Friday, January 08, 2010 12:34 PM  
**To:** LATAG.org  
**Subject:** LATAG Newsletter January 2010.pdf

# **LATAG**

LIBBY AREA TECHNICAL ASSISTANCE GROUP, INC.

**January, 2010**

**NEWSLETTER**

## **Introduction:**

The Libby Area Technical Advisory Group (LATAG) operates with a Technical Assistance Grant from the EPA. The Group's chief role is to help the community participate in decision making at the Libby Asbestos Superfund Site. Congress made public involvement in decision making an important part of the Superfund process, insuring that those whose lives are affected by hazardous material contamination should have a say in actions to clean it up.

LATAG provides the following summary of its comments on EPA's proposed plans for clean up of Operable Units 1 (former export plant) and 2 (former screening plant). The summary and complete commentary document is available

on request and will be available on the LATAG Website <http://www.latag.org/>. Questions and comments are welcome and can be addressed at the next regular LATAG meeting at 7 pm, January 12th, 2010 at Flathead Valley Community College in Libby, Montana. LATAG encourages the public to participate and respond!

The Libby Area Technical Advisory Group requested Dr. Terry Spear, PhD, the group's technical advisor, to provide commentary on EPA's proposed plans for remediation of Operable Units 1 and 2. The LATAG Board has been working with Dr. Spear under contract this past year, bringing his expertise to assist the group in review of clean-up activities and make recommendations. Dr. Spear is a professor of industrial hygiene at the University of Montana / Montana Tech., Butte, MT.

The LATAG Board has participated in the development of this document, and has reviewed and approved this final document generated by Dr. Spear for submission to the EPA in response to the request for commentary on proposed remedial plans for OU-1 and OU-2.

LATAG's summary of its comments on EPA's proposed plans for clean-up of Operable Units 1 (former export plant) and 2 (former screening plant) is available on the LATAG website at:

**[http://www.latag.org/OU1\\_OU2\\_summary.html](http://www.latag.org/OU1_OU2_summary.html)**

The complete commentary document is available on request and is available on the LATAG Website at:

**[http://www.latag.org/OU1\\_OU2\\_commentary.html](http://www.latag.org/OU1_OU2_commentary.html)**

Questions and comments are welcome and can be addressed at a regular LATAG meeting.

The next Regular LATAG meeting will be 7 pm, January 12<sup>th</sup>, 2010 at Flathead Valley Community College.

LATAG encourages the public to respond!

Public comments should be sent to:

**Ted Linnert**  
**Office of Communication & Public Involvement**  
**U.S. Environmental Protection Agency, Region 8 - OC**  
**1595 Wynkoop Street**  
**Denver, CO 80202-1129**  
**(303) 312-6119 / fax (303) 312-7110**  
**toll free: 1-800-227-8917 ext. 6119**  
**[linnert.ted@epa.gov](mailto:linnert.ted@epa.gov)**

***EPA states the comment period ends Saturday, January 16th, 2010.***

***LATAG suggests that EPA receive all comments on or before Thursday, January 14th, 2010***  
***Even if you're unable to comment by these dates you're encouraged to comment!***

## **Report Summary**

From the above discussion, it is clear that we still do not have enough information to estimate cancer and non-cancer risks from community exposures to LA associated with OU1 and OU2.

Because of the complex multiple pathways of exposure to LA in the Libby area, and the lack of representative activity based sampling exposure data from the OU1 and OU2, uncertainties in exposure and risk of adverse health effects associated with OU1 and OU2 could result in an underestimate of cumulative cancer and non-cancer risks from exposure to LA in Libby.

The potential future health risks to Libby residents from exposure to LA is unknown because of uncertainties associated with: (a) the methods used to analyze asbestos; (b) the estimation of potential exposure to airborne asbestos from contaminated soils; (c) the lack toxicological information specific to LA; (d) the relative toxicity of short asbestos fibers (i.e., fibers <5 µm in length) in non-cancer health effects and (e) the lack of epidemiologic data evaluating the risk of adverse health outcomes associated with low-level, intermittent exposures to LA.

Before any Records of Decision are implemented in Libby, the uncertainties outlined above must be addressed:

- (a) (a) Improved analytical methods must be used to quantify levels of LA in both soil and air at OU1 and OU2 and throughout Libby.
- (b) (b) Conduct site-specific, activity-based field tests, during all seasons of the year, to assist in developing empirical relationships for exposure scenarios involving re-suspension of asbestos fibers from solid media (e.g., soil, dust) into air. Without knowledge of such relationships, the assurance of the elimination of exposure pathways and the protection of public health is uncertain. These limitations impede site-specific exposure assessment and risk characterization.
- (c) (c) Execute a comprehensive LA toxicity assessment to determine the effectiveness of the Libby clean-up actions and whether more actions are required. The toxicity assessment should include the effects of low dose exposure on susceptible populations, including children. Toxicology studies are also needed to adequately define the toxicity associated with short (<5 µm) LA fibers since these fibers are predominant in Libby, including ambient air.
- (d) (d) Determine the reference concentration (RfC) for inhalation exposure to LA, including the risk contribution of LA fibers less than 5 micrometers (µm) in length and 0.25 µm in diameter.
- (e) (e) Sponsor epidemiologic studies employing the use of activity-based sampling results from Libby to allow the reconstruction of lower-bound estimates of exposure to LA associated with clinically detectable disease.

In policies issued by EPA in their Risk Assessment Guidance for Superfund, EPA is required to understand the cumulative risk from all exposures in the Libby area, and not just one OU.

Recent case-control studies provide evidence for increased mesothelioma and lung cancer risks at very low lifetime cumulative exposures to amphibole asbestos. The Risk Assessment Guidance document requires EPA determine the complete exposure pathways that exist for the Libby site. EPA is required to quantify the magnitude, frequency and duration of exposure for each pathway identified in Libby to determine cumulative risk. EPA is required to estimate reasonable maximum exposures for individual pathways. Given the complex multiple pathways of exposure to LA in the Libby area, the combination of exposures across pathways must be considered in cumulative risk estimates.

Exposure assessments must consider past, present, and future exposures. The Libby population has already had significant exposures to date that must be included in any benchmarks with consideration of future acceptable exposures. This is critically important for subpopulations that

may be at increased risk from exposures to LA due to increased sensitivity, behavior patterns that may result in high exposure, and/or current or past exposures from other sources. Subpopulations in Libby that may be more sensitive to exposure to LA include infants and children, elderly people, and people with chronic illnesses.

## Board Members

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